

REMARKS

Applicants respectfully request careful consideration of the Remarks contained herein in response to the Non-Final Office Action mailed September 26, 2007. Applicants respectfully submit that the Remarks contained herein place the instant application in condition for allowance. Claims 86 – 103 are pending. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

I. Examiner Interview

Applicants first wish to express their sincere appreciation for the time that Examiner Ouellette spent with Applicants' Attorney, Jeffrey R. Kuester, during a telephonic interview on November 26, 2007. During that interview, the below distinctions were discussed regarding U.S. Patent Number 6,061,660 ("*Eggleston*") and U.S. Patent Number 6,298,327 ("*Hunter*"). While no agreement was reached during that interview, Applicants respectfully request careful consideration of this response.

II. Rejections Under 35 U.S.C. § 103

The Office Action indicates that claims 86 – 103 are rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent Number 6,298,327 ("*Hunter*") in view of U.S. Patent Number 6,061,660 ("*Eggleston*"). Applicants respectfully traverse these rejections on the grounds that the cited references do not disclose, teach, or suggest all of the claimed elements.

As previously presented, claims 86, 92, and 98 each include the following element, "*responsive to receiving the disclosure gift information associated with each innovation disclosure of the plurality of innovation disclosures, automatically updating an associated balance of stocked disclosure gifts.*" According to the Office Action, *Hunter* fails to disclose this element. However, the Office Action further states:

Eggleston discloses the creation of employee incentive programs, which include tracking/automated fulfillment of non-monetary reward distribution data to include sponsor and award databases (Fig. 20, C8 L13-20, C31 L25-67, C32 L1-20, C45-C46).

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to have included receiving disclosure gift information associated with each innovation disclosure of the plurality of innovation disclosures; responsive to receiving the disclosure gift information associated with each innovation disclosure of the plurality of innovation disclosures, and automatically updating an associated balance of stocked disclosure gifts, as disclosed by Eggleston in the system disclosed by Hunter, for the advantage of providing a method for tracking innovations with the ability to increase effectiveness of the system by offering/tracking all facets of innovations submission process, to include compensating/awarding the innovation submitter.

As the Office Action correctly determined, *Hunter* does not include any discussion of innovation disclosure gift information, associations with innovation disclosures, and automatic updates of stocked disclosure gift balances. More importantly, while the Office Action correctly recognizes that *Eggleston* discloses incentive programs for employees, Applicants respectfully emphasize that the Office Action does **not** state that *Eggleston* discloses what is admittedly missing from *Hunter*. In other words, it is important to note that the Office Action does not suggest that *Eggleston* discloses the claimed elements regarding innovation disclosure gift information, associations with innovation disclosures, and automatic updates of stocked disclosure gift balances. Consequently, Applicants contend that any combination of *Hunter* with *Eggleston* will simply not result in showing all of the elements of the currently pending claims.

In addition, Applicants further submit that it would not be obvious to modify *Hunter* as stated in the Office Action. According to the Office Action, it would be obvious to modify *Hunter* “for the advantage of providing a method for tracking innovations with the ability to increase effectiveness of the system by offering/tracking all facets of innovations submission process, to include compensating/awarding the innovation submitter.” Applicants submit that it has not been shown how combining the generic employee incentive system of *Eggleston* with the disclosure authoring system of

Hunter would provide the stated advantage, especially since elements of the proffered advantage are not shown in either reference.

Furthermore, Applicants contend that great synergy and unexpected results occur with the combination of the claimed elements that would not be predicted by one of ordinary skill in the art. Moreover, Applicants respectfully submit that separate fields of endeavor are combined in a way that provides advantages not previously suggested or expected. For example, inventive advantages are realized when scaling a large system for managing intellectual property assets. Applicants submit that automatically updating balances of stocked disclosure gifts in response to receiving disclosure gift information associated with each innovation disclosure of the plurality of innovation disclosures is simply not shown or rendered obvious by the cited references.

CONCLUSION

In conclusion, Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and presently pending claims be allowed to issue.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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